

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> <p>LECLAIRRYAN, A PROFESSIONAL CORPORATION 1037 Raymond Boulevard Sixteenth Floor Newark, NJ 07102 Telephone (973) 491-3600 Facsimile (973) 491-3526 Kim R. Lynch, Esq. (KL-5866) kim.lynch@leclairryan.com Attorneys for Charles M. Forman, Chapter 7 Trustee</p>		<p>Chapter 7</p> <p>In Re:</p> <p>WRS HOLDINGS, LLC; <u>et al</u>¹,</p> <p>Debtors.</p> <p>Case No. 10-28457 (SLM) Jointly Administered</p> <p>Hearing Date: May 30, 2017 Hearing Time: 10:00 a.m</p>
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**CERTIFICATION OF CHARLES M. FORMAN, CHAPTER 7 TRUSTEE, IN SUPPORT
OF MOTION FOR ENTRY OF AN ORDER DISALLOWING THE CLAIMS FILED
BY FORD MOTOR CREDIT COMPANY LLC IN THE DEBTORS' CASES**

CHARLES M. FORMAN, of full age, hereby certifies as follows:

1. I am the chapter 7 trustee of WRS Holdings, LLC, WRS, LLC, Woods Restoration Services, LLC, Woods Restoration Services of South Carolina, LLC, Woods Restoration Services of Montclair, New Jersey, LLC, Environmental Remediation Concepts, LLC, and WRS, Inc., (collectively, the “Debtors”).

¹ The Debtors in these jointly administered chapter 7 cases are WRS Holdings, LLC, Case No. 10-28457 (DHS); WRS, LLC, Case No. 10-28461 (DHS); Woods Restoration Services, LLC, Case No. 10-28465 (DHS); Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474 (DHS); Environmental Remediation Concepts, LLC, Case No. 10-28476 (DHS); and WRS, Inc., Case No. 10-28478 (DHS).

2. I submit this certification in support of my motion for entry of an order pursuant to 11 U.S.C. § 502(a) and Rule 3007 of the Federal Rules of Bankruptcy Procedure disallowing the proofs of claim filed by Ford Motor Credit Company LLC (“Ford”) in the Debtors’ cases set forth on Schedule A annexed hereto and made a part hereof.

A. BACKGROUND.

3. The Debtors each filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) on June 16, 2012 (the “Petition Date”).

4. On June 21, 2010, an order was entered directing the joint administration of the Debtors’ cases.

5. The Debtors’ cases were subsequently converted to proceedings under Chapter 7 of the Bankruptcy Code on July 20, 2010.

6. The Court fixed November 12, 2010 as the last date to file proofs of claim in the Debtors’ cases.

7. Ford filed seventeen (17) proofs of claim (the “Ford Claims”) in the chapter 7 case of WRS Holdings, LLC (Case No. 10-28457) as set forth on Schedule A attached hereto and made a part hereof. Ford is asserting the entitlement to a secured claim against the Debtors’ estates based on duly perfected interests in various vehicles (the “Ford Vehicles”).

B. THE OBJECTION.

8. I object to the allowance of the Ford Claims on the basis that they are not valid claims against the estates.

9. On September 14, 2010, an order was entered authorizing me to sell virtually all of the Debtors’ assets, including the Ford Vehicles. [Docket No. 122]. In order to convey clear title to the vehicles I sold, I was required to satisfy in full any properly perfected liens on the

vehicles. Thus, upon receipt of proceeds from related to the sale of any Ford Vehicles, I paid Ford the amount of the its secured claim attributed to that particular vehicle in full.

10. The Debtors' vehicles without equity were either abandoned by me or the automatic stay was vacated to allow Ford to foreclose their interests in the Ford Vehicles.

11. Accordingly, the bank accounts that I maintain for the Debtors' estates do not contain any proceeds to which the secured claim of Ford may attach.

12. Thus, I respectfully request that the claims filed by Ford in the Debtors' cases as set forth on Schedule A be disallowed.

13. No previous application has been made for the relief sought herein.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge and belief, and I understand that if any of the foregoing statements are wilfully false, I am subject to punishment.

/s/ Charles M. Forman

Charles M. Forman

Dated: May 1, 2017